



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

April 21, 2022

By ECF

The Honorable Lewis J. Liman
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Alim v. United States*, No. 21-cv-2234 (LJL) (JEW)

Dear Judge Liman:

This Office represents the Defendant United States of America (the “Government”) in the above-referenced matter brought pursuant to the Federal Tort Claims Act, 28 U.S.C. §§ 1346, 2671 *et seq.* On behalf of the Government, I write respectfully to request an adjournment of the post-discovery status conference scheduled for April 29, 2022, and the parties’ deadlines for submission of a joint status letter. (ECF No. 34.)

On April 11, 2022, this case was reassigned to Your Honor from Judge Alison J. Nathan. The Government has requested an extension of the expert discovery deadline in this matter by letter motion to Magistrate Judge Willis. (ECF No. 35.) The requested deadline for the completion of expert discovery is May 23, 2022 (originally April 22, 2022). The extension of the expert discovery deadline is necessary to allow for depositions of two expert witnesses identified by Plaintiff in this matter.

Accordingly, the Government respectfully requests an adjournment of the April 29, 2022 post-discovery status conference, and the deadline for the parties’ joint submission, to a date after the close of expert discovery convenient to the Court. This is the fifth request for an adjournment of the post-discovery status conference, and the second request for an extension of the deadline for the parties’ joint submission. All previous requests for extensions were granted. I have attempted to contact Plaintiff’s counsel by phone and by email on April 19, April 20, and today, to determine if Plaintiff consents to this request and to the request for an extension of the expert discovery deadline; however, I have not received a response.

Page | 2

I thank the Court for its consideration of this request.

Respectfully,

DAMIAN WILLIAMS
United States Attorney


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cc: Plaintiff's Counsel (By ECF)

The reference to Magistrate Judge Willis for the purpose of general pretrial is WITHDRAWN. A telephonic conference is scheduled for April 27, 2022 at 2:00 p.m. to discuss the government's request. Parties are directed to dial into the Court's teleconference line at 888-251-2909 and use access code 2123101.

4/22/22

SO ORDERED.


LEWIS J. LIMAN
United States District Judge